

HUNTON

HUNTON ANDREWS KURTH LLP
60 STATE STREET
SUITE 2400
BOSTON, MASSACHUSETTS 02109

TEL 617 • 648 • 2800
FAX 617 • 433 • 5022

CHRISTOPHER M. PARDO
DIRECT DIAL: 617 • 648 • 2759
EMAIL: cpardo@hunton.com

February 14, 2025

FILE NO:

Via CM/ECF

The Honorable Dale E. Ho, U.S.D.J.
United States District Court
Southern District of New York
40 Foley Square
New York, New York 10007
HoNYSDChambers@nysd.uscourts.gov

Re: *Piney, et al. v. City of New York, et al.*, Case No. 1:25-cv-00671-DEH-SLC

Dear Honorable Judge Ho:

We represent Defendant BJ's Wholesale Club, Inc. ("BJ's") in the above-referenced matter and respectfully write to request an extension of time for BJ's to answer, move, or otherwise respond to the Amended Complaint.¹

The current deadline for BJ's to respond to the Amended Complaint is Thursday, February 27, 2025. BJ's seeks until Tuesday, April 1, 2025 to respond. BJ's requests this additional time to investigate Plaintiffs' allegations. The Amended Complaint, which is 190 pages long and consists of 1,415 allegations, names 16 Plaintiffs and nearly 90 Defendants. In addition, over 1,050 individuals purportedly have signed consent forms to join the lawsuit as Plaintiffs.

This is BJ's first request for an extension. Counsel for BJ's and Plaintiffs have conferred and we are authorized to represent to the Court that Plaintiffs consent to this request. There currently are no scheduled appearances before the Court.

Thank you for your consideration. Please do not hesitate to have the Court's staff contact us with any questions.

Respectfully submitted,

/s/ Christopher M. Pardo

Christopher M. Pardo

¹ The Amended Complaint improperly refers to BJ's as "B.J.'s Wholesale Club Holdings Inc."

HUNTON

The Honorable Dale E. Ho, U.S.D.J.
February 14, 2025
Page 2

cc. All Counsel of Record (*via CM/ECF*)